IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW MEXICO

CITY OF ALBUQUERQUE,

Plaintiff,

vs. No. 1:21-cv-00349

THE SEGAL COMPANY (Western States), A Maryland Corporation d/b/a Segal Consulting,

Defendant.

PLAINTIFF'S EXPERT DISCLOSURE PURSUANT TO FED. R. CIV. P. 26

Plaintiff City of Albuquerque (the "City"), by and through its counsel of record, Law Offices of Geoffrey R. Romero (Geoffrey R. Romero) and undersigned counsel, and Sanders & Westbrook, P.C. (Maureen A. Sanders), and pursuant to the Third Order Amending Pretrial Deadlines and Federal Rules of Civil Procedure 26, hereby submit its expert disclosures as follows:

1. Charles C. DeWeese, FSA, MAAA 263 Wright Road Collinsville, CT 06019-3754 (860) 778-8165

Charles C. DeWeese is a retained expert witness and should only be contacted through counsel.

Mr. DeWeese's expert report, dated November 30, 2022, is being produced under separate cover to Defendant. Attached to Mr. DeWeese's report the Qualification Standard for Actuaries Issuing Statements of Actuarial Opinion in the United States as Exhibit 1. Mr. DeWeese's Curriculum Vitae is attached to his expert report as Exhibit 2. Mr. DeWeese's list of Documents

1

Reviewed is attached to his report as Exhibit 3. Also attached to Mr. DeWeese's report is the Actuarial Standards of Practice, ASOP 23 Data Quality, ASOP 41 Actuarial Communications as Exhibit 4.

Mr. DeWeese will testify consistent with all opinions set forth in his report. Mr. DeWeese's methodology, analysis, and processes of review is contained in his report.

- 2. Any and all expert witnesses identified by Defendant to whom Plaintiffs do not object.
- 3. Rebuttal witnesses as necessary, who cannot be identified at this time.
- 4. Any and all witnesses necessary for impeachment.

Respectfully submitted,

LAW OFFICES OF GEOFFREY R. ROMERO

/s/ Geoffrey R. Romero
Geoffrey R. Romero, Esq.
4801 All Saints Rd., NW
Albuquerque, NM 87120
(505) 247-3338
Geoff@GeoffRomeroLaw.com

-and-

Maureen A. Sanders
SANDERS & WESTBROOK, P.C.
102 Granite Avenue NW
Albuquerque, NM 87102
(505) 243-2243
mas@sanwestlaw.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of November 2022, I filed the foregoing electronically through the CM/ECF system, which caused the following parties or counsel of record to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Nelson Franse Christina A. Adams RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A. PO Box 1888 Albuquerque, NM 87103 rfranse@rodey.com cadams@rodey.com

Kara Wheatley
Rachel Hancock
Michael J. Prame
Groom Law Group, Chartered
1701 Pennsylvania Ave., NW, Suite 1200
Washington, DC 20006
KWheatley@groom.com
Rhancock@groom.com
Attorneys for the Defendant

/s/ Geoffrey R. Romero
Geoffrey R .Romero

3